

REMARKS

Reconsideration of this application as amended is respectfully requested.

Claims 1 and 3-28 are pending.

Claims 1, 3-28 are rejected under 35 U.S.C. § 103(a) as being unpatentable over *Deshpande et al.* (U.S. 2002/0087728) in view of *Larsson et al.* (U.S. 2003/0110299) and further in view of *Long et al.* (U.S. 2002/0057446).

IDS Objections

References mentioned on pages 2 and 4 of the present application were objected because they were not considered as valid IDS. It is respectfully submitted that those references had been submitted in an IDS received by the USPTO on April 23, 2004. Reconsideration of those references is respectfully requested.

Rejection under 35 USC §103(a) – claims 1, 3-23, and 28

Claims 1, 3-23, and 28 stand rejected under 35 USC §103(a) as being allegedly unpatentable over *Deshpande et al.* (U.S. 2002/0087728) in view of *Larsson et al.* (U.S. 2003/0110299) and further in view of *Long et al.* (U.S. 2002/0057446).

It is respectfully submitted that claims 1 and 3-28 include limitations that are not disclosed or suggested by *Deshpande*, *Larsson*, and *Long*, individually or in combination. Specifically, for example, independent claim 1 includes limitations that a client has capabilities of reconstructing the codestream from a non-JPEG 2000 compliant format into a JPEG 2000 compliant codestream by adjusting values of a variety of markers including at least TLM and PLM markers to reflect the characteristics of the images in view of the JPEG 2000 standard, including making the markers to be JPEG 2000 compatible. As a result, an ordinary JPEG 2000 decoder can be used to decode the reconstructed codestream. The support for these limitations can be found throughout the specification of the present application, such as, for example, pages 20-22 of the specification.

It is respectfully submitted that these limitations are absent from *Deshpande* and *Larsson*, individually or in combination. None of the clients of *Deshpande* and *Larsson* have such capabilities as described above, particularly, the JPEG 2000 codestream reconstruction capabilities.

The Office Action acknowledged that Deshpande and Larsson failed to disclose the limitations of “adjusting values of the at least markers to reassemble the new codestream to be compliant with the JPEG 2000 standard, including adjusting the TLM and PLM markers to be compatible with corresponding markers of the JPEG2000 standard, so that an ordinary JPEG 2000 coder can be invoked to decode the new codestream if, the portions of the compressed codestream received as a result of the request are not JPEG 2000 compliant.” However, Office Action contended that paragraphs [0461]-[0464] of Long disclose this limitation. Applicant respectfully disagrees.

Although Long is related to a video processor; however, Long fails to disclose the specific limitations set forth above. Particularly, Long describe a “Huffman decoder capable of decoding a JPEG encoded data.” Paragraph [0558]. “The content of the data and marker registers are then adjusted for the next decoding cycle.” Paragraph [0561]. However, Long does explicitly disclose “adjusting the TLM and PLM markers to be compatible with corresponding markers of the JPEG2000 standard.”

In addition, Long is not related to JPEG 2000 technology required by the present invention as claimed. In fact, there is no mention of JPEG 2000 within Long, which claims the priority of April 30, 1997, way before the JPEG 2000 standard was released. It is respectfully submitted that the present invention as claimed is not merely related to processing video codestreams. Rather, the present invention as claimed is related to a specific way to process the codestream, particularly, using JPEG 2000 compatible markers.

Furthermore, there is no suggestion within Deshpande, Larsson, and Long to combine with each other. Here, Long is related to a specific multi-instruction stream processor having a specific hardware configuration. It is respectfully submitted that one with ordinary skill in the art, based on the teachings of Deshpande, Larsson, and Long, would not combine theses references because such a combination lacks reasonable expectation of success and such a combination can only based on the impermissible hindsight of the present application.

Even if Deshpande, Larsson, and Long were combined, such as combination still lacks the limitations set forth above. Therefore, for the reasons set forth above, it is respectfully submitted that independent claim 1 as amended is patentable over Deshpande, Larsson, and Long.

Similarly, independent claims 3, 14, and 22 include limitations similar to those recited in claim 1. Thus, for reasons similar to those set forth above, it is respectfully submitted that claims 3, 14, and 22 are patentable over Deshpande, Larsson, and Long. Given that the rest of the claims depend from one of the above independent claims, for reasons similar to those set forth above, it is respectfully submitted that the rest of the claims are also patentable over Deshpande, Larsson, and Long. Withdrawal of the rejections is respectfully requested.

In view of the foregoing, Applicant respectfully submits the present application is now in condition for allowance.

Conclusion

For all of the above reasons, applicants submit that the amended claims are now in proper form, and that the amended claims all define patentable subject matter over the prior art. Therefore, Applicants submit that this application is now in condition for allowance.

Extension of Time

Pursuant to 37 C.F.R. 1.136(a)(3), applicant(s) hereby request and authorize the U.S. Patent and Trademark Office to (1) treat any concurrent or future reply that requires a petition for extension of time as incorporating a petition for extension of time for the appropriate length of time and (2) charge all required fees, including extension of time fees and fees under 37 C.F.R. 1.16 and 1.17, to Deposit Account No. 02-2666.

Respectfully submitted,

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